Law Office of Henry F. Telfeian

P.O. Box 1277 Kings Beach, CA 96143 Tel: 510-333-1645

Email: laborlawyer@gmail.com

June 12, 2017

Via electronic filing

Mr. Gary Shinners
Executive Secretary
National Labor Relations Board
1015 Half Street SE
Washington, D.C. 20570-0001

Re: Thyme Holdings, LLC d/b/a Westgate Gardens Care Center NLRB Case Nos. 32-CA-190480 & 197298

Dear Mr. Shinners:

Pursuant to Section 102.2 of the Board's Rules and Regulations, the Respondent Employer in the above-referenced matters requests a *two-week extension of time*, to and including June 30, 2017 to file a response to the Board's "Notice to Show Cause" issued on June 2, 2017. The Board's Notice requires any response to be filed by Friday June 16th. In support of this request, the Respondent states:

- 1. Although the Notice was issued on June 2, I was on vacation when it was received. I returned to my office on this date, June 12th.
- 2. This week I have two other matters that require my immediate attention negotiations on Wednesday June 14th, and a scheduled arbitration on Thursday June 15th along with the usual office matters that have awaited my return from vacation.
- 3. I am a sole practitioner and have no associates or paralegals to assist me. For that reason, I cannot devote time to this matter until the start of next week.
- 4. This case involves a challenge to certification that must be heard by a court of appeals and a two-week extension of time will not delay this matter in any significant regard.

- 5. I have contacted Ms. Amy Berbower, Counsel for the General Counsel in this matter, and she has advised me that the General Counsel opposes my request.
- 6. I have contacted Manuel Boigues, Counsel for the Charging Party in this matter, but, as of this writing, he has not responded to my request for his position regarding my request.

Thank you for your consideration of this motion. A copy of this letter has been sent via electronic mail to Ms. Berbower and Mr. Boigues and a copy has been filed electronically with Region 32.

Very truly yours,

Henry F. Telfeian

cc: Amy Berbower, Esq. (via email)
Manual Boigues, Esq. (via email)
NLRB Region 32 (via electronic filing)